



January 21, 2019

To: Central Coast Regional Water Quality Control Board via email only
(AgNOI@waterboards.ca.gov)
From: Don Chartrand, Executive Director, Creeklands
Re: Comments Regarding Ag Order 4.0

Greetings,

CreekLands (formerly Central Coast Salmon Enhancement) is a 501(c)(3) environmental nonprofit that has worked to protect central coast watersheds since 1984. Thank you for the opportunity to provide comments on draft Ag Order 4.0. Our intent with this communication is to encourage the Water Board to utilize a mix of voluntary and regulatory approaches that results in human communities and natural ecosystems thriving together.

Resilient communities deeply understand local natural ecosystem realities and adjust their economic activities accordingly. Our purpose at CreekLands is to help develop the scientific understanding of central coast watersheds that leads to sustainable usage practices, and to deliver the science and resulting practice guidelines to benefit all constituencies. When we speak of resilience, we emphasize adapting to an expanded capacity to thrive despite adversity rather than simply trying to “bounce back” to some pre-existing condition. With known drought and wildfire conditions on the landscape, and unknown challenges presented by changing climate conditions, the ability to consider multivariate potentials while establishing resource usage guidelines is critical.

To that end, establishing universal guidelines that apply equally to all land usages across the central coast cannot reasonably be done. We therefore strongly encourage a watershed-based approach that encompasses both environmental health and economic vitality, and therefore recommend the Option 1 approach with localized phases based on level of threat to water quality in each watershed. We want to be certain that you are aware that many central coast landowners are participating with us in several voluntary watershed protection and conservation projects, and to ask that you consider how this approach can be accommodated while crafting the new Ag Order. As opposed to a regulatory enforcement only approach, we believe that higher stakeholder involvement and compliance with the Ag Order will result from emphasizing win-win methodologies that account for highly local conditional variations.

Please include us in future discussions as you refine the specific elements of the Agricultural Order 4.0. In particular, we would be interested in working with stakeholders to develop watershed restoration programs as proposed on page 9 in the options table for riparian habitat management ideally incorporating RipRAM as the mechanism to devise the watershed restoration program. We have developed watershed restoration plans for many of our coastal watersheds that include depictions of existing conditions, water quality and habitat assessments, benthic macroinvertebrate surveys, and stakeholder/agency generated recommendations.

This process could be used in the subwatersheds of Region 5 to establish Ag Order metrics on a subwatershed basis, as opposed to measuring exclusively on ranches. It would also provide the context for improvements in the subwatershed, as land uses change over time. Trends may be more realistically depicted and corrected by applying practices throughout the subwatershed versus on individual parcels/farms.

We are currently working on projects that demonstrate willing landowner support for stream flow enhancement that cumulatively could make a difference for augmenting base flow for local fisheries. This cooperative approach, already part of Ag Order 3.0, could be extended for all Ag Order components (A through E) for each subwatershed and could incorporate voluntary components (incentives) that promote additional smart water components including stormwater retention/recharge, on-site water reuse and increasing water efficiencies that make economic sense.

Thank you for your consideration and we look forward to working with you and other stakeholders in developing the future Ag Order.

Sincerely,

A handwritten signature in dark ink, appearing to read "Don Chartrand". The signature is fluid and cursive, with the first name "Don" being more prominent.

Don Chartrand
Executive Director
CreekLands